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August 31, 2021

ECF Filed

Honorable Kimba M. Wood
United States District Judge
U.S. District Courthouse for S.D.N.Y.
500 Pearl Street
New York, N.Y. 10007

MEMO ENDORSED

**Re: U.S. v. Abreu, et al., including Jose Cruz, Dkt. 19 Cr. 821 (KMW)
With No Opposition by the Government, the Defense Requests a 90-Day
Adjournment of Jose Cruz's September 28, 2021 Sentencing Hearing.**

Dear Judge Wood:

Mr. Jose Cruz is respectfully requesting a 90-day adjournment of his September 28th sentencing hearing so that he may complete a high school equivalency diploma program sponsored by Hostos Community College which began on August 3rd and ends on October 7th. See, Attached August 30, 2021 letter. As noted in the PSR at p. 21, Probation acknowledges that Mr. Cruz would benefit from obtaining his general equivalency diploma (GED). He anticipates sitting for the examination in mid-October and he believes tests results are posted by late October or early November. In addition to attending by videoconference GED classes twice a week at night, as further noted in the PSR, ¶¶ 65-66, Mr. Cruz has maintained full-time employment since his release on bail on January 17, 2020 and is in full compliance with his bail conditions. ¶ 9.

The Government does not oppose this request. This is a first time request by the Defense seeking an adjournment of the sentencing hearing.

Thank you.

*Sentencing is adjourned to
December 20, 2021, at 11:00 a.m.
Defendant's submission is due by
December 4. Government submission
is due by December 13.*

Respectfully submitted,
s/Richard Palma
Richard Palma

Attachment: Hostos Community College letter.

SO ORDERED: N.Y., N.Y. 8/31/21

Kimba M. Wood
KIMBA M. WOOD
U.S.D.J.